

AFMG:Schrock:nw:x381:2565PlymouthRd:1-21-81:CB# 144,A2-4

Dear Light-Duty Vehicle Manufacturer:

The 1991 model year certification and fuel economy programs are now close to completion. This marks the first year in which Abbreviated Certification Review (ACR) was used to process basically all manufacturers' engine families. With ACR, manufacturers were given the authority to make many of the decisions previously made by EPA. This transfer of authority has been based on the premise that the decisions made by manufacturers would be in compliance with Federal regulations, published advisory circulars, and published "guidelines." Personnel from the EPA Certification Division remain involved in the certification process mainly through auditing the manufacturer's decisions and assisting in making some difficult decisions when the manufacturers are unsure as to resolving the issues.

The ACR program was originally designed to be flexible enough to allow adjustments in procedures when EPA felt that optimum results were not being obtained. Consequently, there have been periodic changes as the ACR program progresses to a final working tool for certification. Overall, the ACR program has been successful in the 1981 model year. The combination of the ACR program and audits has allowed manufacturers to certify their product lines in a more streamlined manner as well as providing EPA the opportunity to manage a certification program with mandated personnel reductions. The cooperation of manufacturers has been instrumental in the progress made in this direction and EPA asks for continued assistance in making the program work.

Although the ACR program has been successful overall, there have been some problems noted through the auditing system. This letter will identify some of those problems in the hope that the same problems will be avoided for the 1982 model year. The enclosure to this letter includes a discussion of some of these problems.

The principal features of the 1982 model year ACR program are the same as the 1981 model year. These features were summarized in Enclosure I of our letter concerning the 1981 model year ACR program (December 1979).

The delegation to manufacturers of authority to make specific decisions is also similar to that employed in the 1981 model year ACR program (Enclosure II of our December 1979 letter). One change is that authority to discontinue an emission-data vehicle or durability-data vehicle without the Administrator's prior written approval has been qualified. For the 1982 model year the authority is transferred only if the manufacturer submits to EPA reasons for discontinuance. The submission can be on vehicle logs already routinely delivered to EPA or through another alternative format provided by the manufacturer. Most manufacturers have already done this for the 1981 model year. The reasons need not be lengthy in explanation. Examples of expected typical reasons are: Projected line-crossing of HC standard, projected CO deterioration factor (d.f.) exceeded design intent, similar durability-data vehicle completed mileage accumulation with d.f. lower than projected d.f.'s for discontinued vehicle, mechanical failure of EGR valve, vehicle involved in accident, plans to certify vehicle equipped with engine size cancelled, etc. If investigation of discontinued vehicles reveals mechanical problems, these problems should be included in reason for discontinuance, (Authority to discontinue is not delegated if the manufacturer will not routinely submit reasons.)

Additionally, to meet the requirements of §86.079-22 the manufacturer, in lieu of EPA, will adjudge in advance the appropriateness of all adjustments and modifications recommended to be performed on vehicles to assure that they will be capable of meeting applicable emission standards at any altitude of operation in accordance with §86.082-8(g)(1) or §86.082-9(g)(1). Also the manufacturer, in lieu of EPA, will grant exemptions for vehicles from the high-altitude emission standards as set forth in §86.082-9(d). Finally, a qualification will be placed on the previous transfer of authority for decisions covered by §86-079-25(a)(5)(i) (A) and (B) as outlined below. For the 1982 model year, the manufacturer will not be allowed to adjudge the appropriateness of unscheduled maintenance when made in conjunction with an emission test such that the end result could lead to invalidating the test, performing unscheduled maintenance, and then retesting the vehicle to obtain the official data to be used for certification. In such cases the manufacturer will be required to obtain prior approval from EPA. For all other unscheduled maintenance decisions, the manufacturer

will continue to have authority.

It is expected that manufacturers will require less assistance than in previous model years because of their experience in the ACR program. As in the 1981 model year, the EPA support is of necessity limited and should be reserved for the most important and critical issues. Because time allocated for consultation and assistance will again be scarce, the same specific procedure as used in the 1981 model year will be required to ensure that the time available for meetings is effectively and equitably used. Therefore, each manufacturer is asked to contact the appropriate team member in advance of proposed meeting and submit a complete agenda of the issues that are to be discussed. This procedure will allow the elimination of unnecessary meetings which are proposed for dealing with issues that can be more expeditiously handled by letter, telephone, or Telex. Also, each manufacturer is requested to periodically submit to EPA a priority list of outstanding issues that involve EPA assistance or consultation. This list would include issues such as running changes, field fixes, letters requesting assistance in carryover determinations, letters requesting written answers on EPA policies, requests for approval of fuel economy label values, etc. The list should have, at a minimum, a brief description of the issue, date of submission to EPA, type of EPA action expected (e.g., letter of approval, phone call, etc.), and applicable model year. Although submission of a priority list is voluntary, EPA believes it would be advantageous to both manufacturers and EPA to help assure optimum turnaround time. Although the manufacturer's requested priority will not always be possible, EPA will certainly be able to consider it when allocating time for assistance to each manufacturer. Additionally, such lists as used by some manufacturers in the past have helped to keep all of the manufacturer's requests clearly in view of the appropriate certification team.

If you have any questions regarding this program, or if your particular circumstances require modification of the program, your EPA team member will endeavor to deal with this issue in an appropriate way. If resolution cannot be reached to your satisfaction, the Team Leaders, Branch Chiefs, and I will become involved, as necessary, to attempt to provide satisfactory resolution.

Sincerely yours,

Robert E. Maxwell, Director
Certification Division
Mobile Source Air Pollution Control
Enclosure